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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

2:18-CR-47-RMP

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

Vio. 18 U.S.C. §§ 2261A(2)(A),
2261(b)(5),(6) Cyber Stalking
(Count 1)

vs.

THOMAS MARTIN ROBERTS,

Vio. 18 U.S.C. §§ 2261A(2)(B),
2261(b)(5),(6) Cyber Stalking
(Count 2)

Defendant.

The Grand Jury Charges:

COUNT 1


Beginning on or about April 14, 2014, and continuing until on or about April 19, 2015, in the Eastern District of Washington, the Defendant, THOMAS MARTIN ROBERTS, with the intent to harass and intimidate another person, to wit: D.S., used an electronic communication system of interstate commerce to engage in a course of conduct that placed D.S., a person who previously had a romantic and intimate relationship with THOMAS MARTIN ROBERTS, and had a restraining order issued by a civil and criminal court to for the purpose of preventing THOMAS MARTIN ROBERTS from committing violent and threatening acts and harassment, in reasonable fear of serious bodily injury, all in violation of 18 U.S.C. §§ 2261A(2)(A), 2261(b)(5), (6).


COUNT 2

Beginning on or about August 8, 2014, and continuing until on or about April 19, 2015, in the Eastern District of Washington, the Defendant, THOMAS MARTIN ROBERTS, with the intent to injure, harass, and intimidate another person, to wit: D.S., used an interactive computer device and electronic communication service of interstate commerce and did place under surveillance D.S., a person who previously had a romantic and intimate relationship with THOMAS MARTIN ROBERTS, and had a restraining order issued by a civil and criminal court to for the purpose of preventing THOMAS MARTIN ROBERTS from committing violent and threatening acts and harassment, all of said acts to cause, attempt to cause and would reasonably be expected to cause substantial emotional distress to D.S., all in violation of 18 U.S.C. §§ 2261A(2)(B), 2261(b)(5), (6).

DATED this 20 day of March, 2018.

A TRUE BILL


JOSEPH H. HARRINGTON
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